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PRE-APPEAL BRIEF REQUEST FOR REVIEW

Docket Number (Optional): MS1 - 452US

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on August 17, 2006 via EFS Web.

Signature: Pam M. Prellwitz

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Application Number	Filed
09/606,811	6/28/2000

First Named Inventor: Jian Wang

Art Unit	Examiner
2626	OPSASNICK, MICHAEL N.

Applicant requests review of the final rejection in the above-identified application. No amendments are being filed with this request.

This request is being filed with a notice of appeal.

The review is requested for the reason(s) stated on the attached sheet(s).
Note: No more than five (5) pages may be provided.

I am the

- [ ] applicant/inventor.
- [ ] assignee of record of the entire interest. See 37 CFR 3.71. Statement under 37 CFR 3.73(b) is enclosed. (Form PTO/SB/96)
- [x] attorney or agent of record. Registration number 36756.
- [ ] attorney or agent acting under 37 CFR 1.34. Registration number if acting under 37 CFR 1.34 _____

Signature

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206-315-4001
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August 17, 2006
Date

NOTE: Signatures of all the inventors or assignees of record of the entire interest or their representative(s) are required. Submit multiple forms if more than one signature is required, see below*.

- [ ] *Total of _____ forms are submitted.

This collection of information is required by 35 U.S.C. 132. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11, 1.14 and 41.6. This collection is estimated to take 12 minutes to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application Serial No. 09/606,811
Filing Date 06/28/2000
Inventorship ..... Wang et al.
Assignee ..... Microsoft Corporation
Group Art Unit 2626
Examiner ..... Michael N. Opsasnick
Attorney's Docket No. MS1-452US
Title: LANGUAGE INPUT USER INTERFACE

PRE-APPEAL BRIEF REQUEST FOR REVIEW

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REMARKS

The Pre-Appeal Panel (hereinafter "Panel") is respectfully requested to consider this Request. The Panel is requested to reconsider the rejections of record in view of the following remarks.

Rejection of Claims 53, 74, 87, and 88

The most recent Office Action dated February 17, 2006, asserts that independent claims 53, 74, 87, and 88 are unpatentable under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,214,583 to Miike et al. ("Miike") in view of U.S. Patent No. 5,987,403 to Sugimura ("Sugimura") in further view of U.S. Patent No. 5,732,276 to Komatsu et al. ("Komatsu"). However, if for the sake of discussion one of ordinary skill in the art at the time the invention was

made were to combine all of these cited references, the combination of references nonetheless fails to teach or suggest all of the elements recited by independent claims 53, 74, 87, and 88, let alone additional elements recited by the dependent claims.

The References Fail to Show Input and Output Text in a Continuous String

The Office Action incorrectly asserts that combining Miike with Sugimura discloses "output text, converted from the input text . . . displayed together with unconverted input text . . . in at least one continuous string of text" as recited in claim 53. The Office Action asserts that Miike is not clear as to the "proximity of the two texts," including the original text and the translated text (Office Action, Page 2, Paragraph 6). Respectfully, the Office Action's acknowledgement that the two texts are, at best, proximate, concedes that the input text and output text are not presented in a "continuous string of text," as recited in claim 53. Moreover, applicants submit that FIGURES 7-16 of Miike illustrate an interface where nontranslated text appears in a first field on a different side of a display that the translated text, which is presented in a separate, second field on an ***opposite side*** of the display. Thus, by teaching maintaining separate areas for presentation of nontranslated and translated text, in itself, Miike teaches away from the recitation of claim 53 of "output text, converted from the input text . . . displayed with unconverted input text . . . in at least one continuous string of text."

Conceding that Miike fails to teach this limitation of claim 53, the Office Action is mistaken that Sugimura makes up for the shortcomings of Miike in teaching the display of output text and input text in a continuous string. Because Miike shows separate display of the nontranslated text and the translated text, one would not combine such a reference with a reference that taught an inapposite,

countervailing presentation of the input and output text. Furthermore, even if such an illogical combination were to be made, Sugimura fails to disclose displaying "target and source data together" as asserted by the Office Action. FIGURES 7, 13, and 17 relied upon by the Office Action concern the preparation of the "***Target Display Data*** using the Display Properties of the Source Display Data" and a "Number of Characters of the ***Target Language***" (FIGURE 13, Block S53). However, although the target display data is prepared with regard to properties of the source display data, there is nothing in the figures relied upon or the accompanying text that shows the target display data and the source display data displayed together in a continuous string. Furthermore, FIGURE 6 of Sugimura plainly shows the nontranslated text and the translated text being displayed separately, in different strings of text. Thus, a combination of Miike and Sugimura fails to teach or suggest what is recited in claim 53.

Similarly, the combination of these references fails to teach or suggest what is recited in claims 74, 87, and 88. Claim 74 recites "the user interface being configured to display the converted output text in-line with unconverted input text in at least one continuous string of text." Claim 87 recites displaying "the language text and unconverted phonetic text in-line together in at least one continuous string of text." Claim 88 recites displaying "the language text, non-phonetic text, and unconverted phonetic text in-line together in at least one continuous string of text." For the reasons described with regard to claim 53, the references relied upon by the Office Action fail to teach or suggest these limitations, and thus fail to render unpatentable claims 74, 87, and 88.

The References Fail to Show Output Replacing Input Text during Conversion

The Office Action incorrectly asserts Komatsu overcomes the shortcomings of other cited references in disclosing that "output text replaces the input text from which the output text was converted as each portion of the input text is converted" as recited by claim 53. Applicants wish to note that the Office Action acknowledges that Komatsu "teaches displaying the translation of the input text at ***certain stages*** of translation" (Office Action, Page 3, Paragraph 2; emphasis added). However, suggesting that the display of stages of the translation is the same as replacing input text with output text as it is converted is misleading; the stages referenced by Komatsu do not refer to portions of text being converted, but to different phases of the translation of complete strings of text.

The text of Komatsu relied upon by the Office Action at Column 4, Line 64, through Column 5, Line 25, describes how FIGURES 2(a)-2(d) depict entirely different stages of the translation of a Japanese phrase that means "The President flew to France." The stages displayable include an "inputted text buffer 2, morphological analysis of [the] ***completed*** text buffer 5, translation equivalent conferred text buffer 7 in which equivalents have been conferred to content words, and structure conversion completed text buffer 9 for which conversion of sentence structure to that of the target language has been completed" (Komatsu, Column 4, Lines 8-15; emphasis added). As evidenced by Komatsu, the different stages of the translation are displayable ***after*** the "***completed text buffer***" includes the whole phrase or sentence to be translated. Moreover, the stages displayable are not segments of that phrase of sentence, but include different steps within the translation of that complete phrase or sentence. Thus, Komatsu does not show that "the output text replaces the input text from which the output test was converted as

each portion of the input text is converted" as recited by claim 53, and therefore, fails to overcome the admitted shortcomings of the other cited references that the Office Action alleges render claim 53 unpatentable.

Komatsu similarly fails to make up for the shortcomings of the references applied to claims 74, 87, and 88. Komatsu fails to teach or suggest "the output text is substituted for the input text from which the output text was converted as each portion of the input text is converted" as recited by claim 74. Similarly, Komatsu also fails to each or suggest "the language text replaces the phonetic text from which the language text was converted as each portion of the phonetic text is converted" as recited by claims 87 and 88. Thus, for the reasons described with regard to claim 53, the references cited fail to teach or suggest these limitations, and thus fail to render claims 74, 87, and 88 unpatentable.

Rejection of Claims 54-73 and 75-85

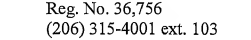
Applicants submit that these claims add additional limitations to the claims from which they depend. Thus, these claims are patentable for at least the same reasons as independent claims 53, 74, 87, and 88.

CONCLUSION

The pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the subject application.

Respectfully Submitted,

Date: 8-17-2006

By: 

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